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7                   UNITED STATES DISTRICT COURT  
8                   WESTERN DISTRICT OF WASHINGTON  
9                   AT SEATTLE

10 ELIZABETH DE COSTER, *et al.*, on behalf of  
11 themselves and all other similarly situated,

12                   Plaintiffs,

13                   v.

14 AMAZON.COM, INC., a Delaware corporation,

15                   Defendant.

16 DEBORAH FRAME-WILSON, *et al.*, on behalf  
17 of themselves and all other similarly situated,

18                   Plaintiffs,

19                   v.

20 AMAZON.COM, INC., a Delaware corporation,

21                   Defendant.

22 CHRISTOPHER BROWN, *et al.*, on behalf of  
23 themselves and all others similarly situated,

24                   Plaintiffs,

25                   v.

26 AMAZON.COM, INC., a Delaware corporation,

27                   Defendant.

No. 2:21-cv-00693-JHC

**STIPULATED MOTION AND  
ORDER REGARDING SEALING  
OF CLASS CERTIFICATION  
BRIEFING**

**NOTE ON MOTION CALENDAR:  
July 31, 2024**

No. 2:20-cv-00424-JHC

No. 2:22-cv-00965-JHC

STIP. MOT. & ORDER

RE SEALING OF CLASS CERT. BRIEFING

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC) - 1

1       The Parties have met and conferred with respect to the upcoming briefing on class  
 2 certification, and anticipate that their briefs, declarations, exhibits, and expert reports will quote  
 3 from and/or describe in detail a significant amount of information that has been designated as  
 4 Confidential or Highly Confidential-Attorneys' Eyes Only by either a Party or Non-Party.  
 5 Accordingly, in order to ensure that such materials are treated appropriately under the applicable  
 6 protective order, and to reduce burdens on the Court, the Parties, and Non-Parties, pursuant to  
 7 LCR 7(d)(1) and 10(g), the Parties and their respective counsel hereby stipulate and agree to the  
 8 following procedure for filing and sealing in connection with the class certification briefing,  
 9 subject to the Court's approval.

10       1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its class  
 11 certification briefs (including any opening, response, and reply briefs), expert declarations or  
 12 reports, exhibits, and all other evidence and declarations on which that Party relies (collectively,  
 13 "Class Certification Papers") which contain material designated Confidential or Highly  
 14 Confidential-Attorneys' Eyes Only by any Party or Non-Party.

15       2. Within four weeks of the filing of Plaintiffs' reply brief, pursuant to LCR 5(g), the  
 16 Parties, and any necessary Non-Parties, will meet and confer and, as appropriate, file (1) public  
 17 versions of their Class Certification Papers, with necessary redactions, and (2) corresponding  
 18 motion(s) to seal pursuant to LCR 5(g)(3). The schedule for filing any such public versions of  
 19 the Parties' Class Certification Papers and corresponding motion(s) to seal shall be as follows:

|   | <b><i>DE COSTER</i></b> | <b><i>FRAME-WILSON</i></b> | <b><i>BROWN</i></b> |
|---|-------------------------|----------------------------|---------------------|
| Reply in Support of Motion to Certify Class <sup>1</sup>                                  | January 24, 2025        | May 23, 2025               | September 16, 2025  |
| Filing of public versions of Class Certification Papers and corresponding Motions to Seal | February 21, 2025       | June 20, 2025              | October 14, 2025    |

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 27       1 See *De Coster et al. v. Amazon.com, Inc.*, No. 2:21-cv-00693-JHC, ECF No. 160.  
 STIP. MOT. & ORDER  
 RE SEALING OF CLASS CERT. BRIEFING  
 (No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC) - 2

1       3.     The Party or Non-Party seeking to maintain material under seal (or under  
2 redaction) shall be the movant for purposes of any such motion(s) to seal associated with the  
3 Parties' class certification briefing.

4           IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

5           DATED July 31, 2024.

Respectfully submitted,

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36                   *proposed Class*

37                   STIP. MOT. & ORDER

38                   RE SEALING OF CLASS CERT. BRIEFING

39                   (No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC) - 3

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19 STIP. MOT. & ORDER

20 RE SEALING OF CLASS CERT. BRIEFING

21 (No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC) - 4

1 IT IS SO ORDERED.  
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Dated: July 31, 2024

*John H. Chun*

4 John H. Chun  
5 United States District Judge  
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